

Appln No: 09/818,006  
Amdt dtd: December 7, 2004  
Reply to Action dtd: October 12, 2004

**Amendments to the Drawings:**

Please amend FIG 2 to add two blocks containing the legends "Receiving Device" and "Transmitting Device", respectively, to (inside) the block containing the legend "Training Means".  
Enclosed please find a replacement sheet and a marked-up copy of the amended drawing.

Attachment: Replacement Sheet  
Annotated Sheet Showing Changes

### REMARKS/ARGUMENTS

Claims 1-29 are pending. The independent claims are method claims 1 and 12, and system claim 15. Independent claims 1 and 15 are rejected as obvious under 35 U.S.C. § 103(a) from *Chiang* (U.S. Patent No. 5,535,422) in view of *Mustafa* (U.S. Pub. No. 2002/0059378 A1). Independent claim 12 is not rejected as obvious or anticipated. Additionally, all of the claims are rejected under 35 U.S.C. § 112.

Regarding section two of the Office Action, the specification is now amended to more properly use the term “powerpoint.” Regarding section 3 of the Office Action, claim 28 is now cancelled without prejudice, merely in order to expedite the prosecution and narrow the issues.

Regarding section 4 and the penultimate paragraph of section 5, those parts of the Office Action reject independent claim 15 and the claims depending therefrom as not enabled, the asserted problem is that the limitation “training means” is not adequately described in the specification as originally filed. Applicant respectfully notes that the term “training means” was used in claim 15 as originally filed, and the previous three Office Actions apparently did not address this issue. The training means **230** is shown in FIG 2, and is discussed in the paragraph beginning at page 6, line 16 of the application. Also, the training means **330** is shown in FIG 3, and is discussed in the two paragraphs beginning at page 7, line 7 of the application. A person skilled in the art would understand from FIG 2, for example, that the training means **230** includes a transmitting device for transmitting the training signal **232** and also a receiving device for receiving the difficulties information signal. Therefore, FIG 2 is now amended for clarification and replacement FIG 2 is attached herewith. Thus, a person skilled in the art will clearly understand what is meant by the term “training means” in view of the discussion in the specification, in addition to the figures.

Regarding section 5 of the Office Action, first paragraph, it is stated that “applicant’s arguments appear to refer to the actual step of ‘programming,’ not the coding step. Clarification of this issue is required.” The Office Action also states that “It is common knowledge that programming a programmable logic controller (PLC) is a two-step process, consisting of a coding step and a programming step.” Applicant now clarifies that applicant’s arguments were not meant to exclude the coding step. Thus, it is respectfully submitted that claim 12 should be allowed.

**Independent Claims 1 and 15 Should Also be Allowed**

Claim 29 is now cancelled, and its limitations are inserted into claim 1, and a similar limitation is inserted into claim 15. At page 6 of the Office Action, last paragraph, "official notice" is taken that it is an old and well-known principle that students learn a task more efficiently when they perform the task rather than having it performed "by" them. Applicant assumes that the Office Action meant to say "for" them.

The Office Action cites no prior art wherein this principle is combined with programming (e.g. coding) a programmable logic controller. There is no suggestion in the *Mustafa* reference or any other cited reference to combine this limitation. Although having a student perform a task is sometimes considered useful in the educational field, this is only true for some tasks, and not for all tasks.

Applicant is unaware of any prior art reference that suggests combining the limitation of cancelled claim 29 with factory automation training. The fact that all of the cited references take an entirely different educational approach is evidence that the approach of cancelled claim 29 was not heretofore thought useful or obvious for PLC training.

Often, students will learn a task more efficiently in the educational field without performing the task, for example if the educator believes the task is so simple that merely observing it will be sufficient, or if allowing all the students to perform the task would require equipment for each student instead of only equipping the educator. Thus, Applicant must respectfully traverse the statement in the Office Action according to which students will learn a task more efficiently when they perform the task. See MPEP § 2144.03 ("If the applicant traverses such an assertion the examiner should cite a reference in support of his or her position").

Even if it is sometimes more efficient to have students perform a task in some cases, as part of an educational program, it is far from obvious that this is such a case. More often than not, the educational process involves hypothetical problems, instead of actually dealing with those problems firsthand. The Office Action points to no suggestion, teaching, or motivation to combine the limitation of cancelled claim 29 with PLC training. The mere fact that references can be combined does not render the resultant combination obvious unless there is a "suggestion or motivation in the reference" to combine. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990) *cited at* MPEP § 2143.01 (emphasis added).

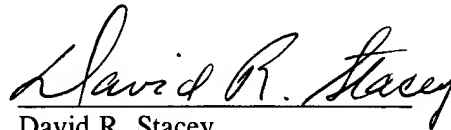
Responsive to the Notice of Non-Responsive Amendment dated October 12, 2004, the status identifiers of Claims 1 and 15 have been changed from "previously presented" to "currently amended"

in this amendment. Further a section entitled Amendments to the Drawings has been inserted at page 7 of this amendment.

**Conclusion**

For the reasons explained, it is earnestly requested that the rejections be withdrawn, that the application be reconsidered, and that the claims be allowed. Applicant respectfully requests that the Examiner please contact Applicant's attorney by telephone, if doing so might facilitate or expedite examination of the present application. It is believed that early passage of the present claims to issuance would be appropriate according to the relevant statutes and regulations, in view of the novel and useful invention claimed by the present application.

Respectfully submitted,

A handwritten signature in cursive script, reading "David R. Stacey". The signature is written in dark ink and is positioned above the printed name and registration number.

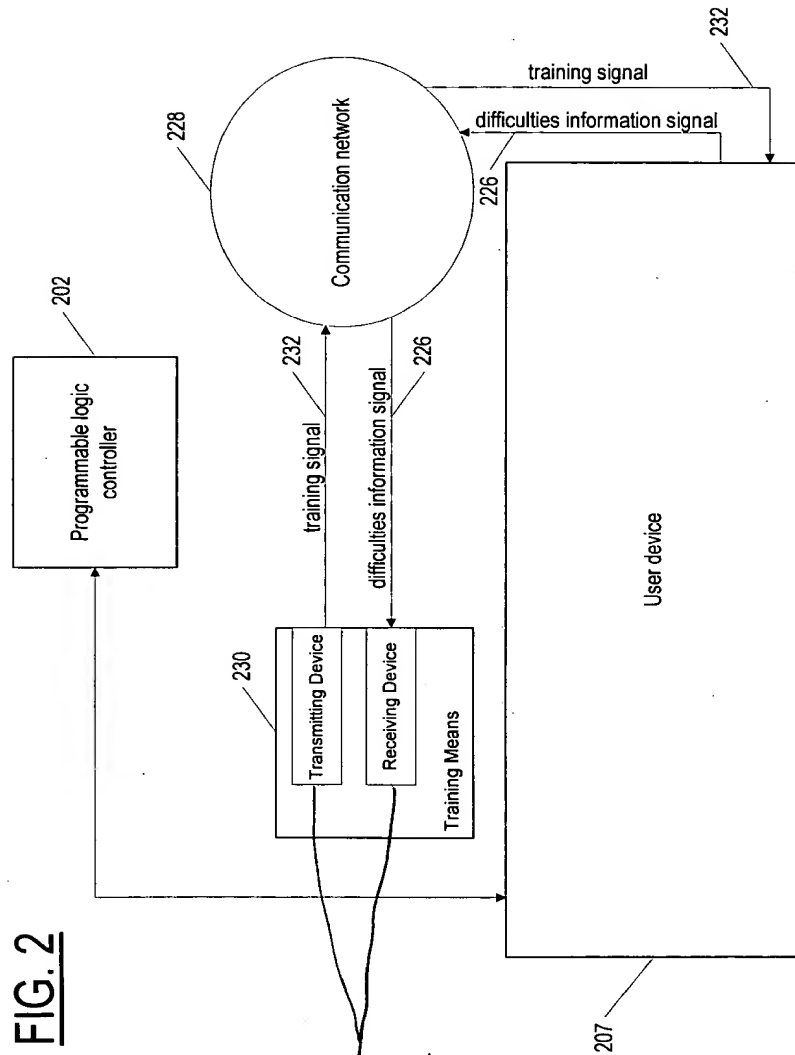
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(Marked-up copy)



These 2  
blocks  
added by this  
amendment.  
-DAS